Worksheet
Documentation of Land Use Plan Conformance and NEPA Adequacy (DNA)

U.S. Department of the Interior
Bureau of Land Management (BLM)
(OR090 –DNA- 04-04)

A. Description of the Proposed Action

The Proposed Action is to burn approximately 20 acres in the West Greenhill unit, located in the Township 17s – Range 4w Section 30 NE ¼ of SE ¼ near Eugene Oregon. Prescribed burning involves the hand application of fire (via drip torches) to remove and control invasive woody plants, remove thatch, and invigorate native plant populations in wet prairie systems. Burns would be low-intensity and short duration, would occur after late August to allow for the majority of plants to set, release seed, and begin to senesce. All burns would comply with BLM and State of Oregon regulations and protocols to minimize the possibility of lost control of the burn. Fire control/suppression would be accomplished with the use of pre-burn hose lays and fire retardant foam, and wet-lining the burn perimeter prior to and during the burn. An area 10-20' wide would be mowed around the outside boundary of the burn area to help assure fire control. Fire vehicles would be restricted to adjacent non–native pasture vegetation. Human movement in the area would be managed to minimize impacts on the native prairie community.

Background

The West Greenhill unit (action area) was purchased in December of 1993 by Eugene District of the Bureau of Land Management (BLM) to protect a native remnant wetland prairie. Four BLM Special Status remnant plant species, all endemic to prairie habitats, occur at the West Greenhill unit. These species include the federally – listed Endangered Willamette daisy (*Erigeron decumbens*), Federal Endangered Bradshaw's lomatium (*Lomatium bradrawii*) and two Bureau Sensitive species white-topped aster (*Aster curtus*) species and shaggy horkelia (*Horkelia congesta*). Willamette Valley prairies evolved with fall season-fires and presumably plants of these prairies are well adapted and potential dependent upon the presence of fire for their continued healthy existence. Presently, the Greenhill unit is being encroached by shrubs and trees. If succession of the prairie to woodland plant community is allowed to continue, native prairie plants would ultimately be extirpated. Continued use of prescribed fire would help control shrubs and tree as well as enhance the reproductive status of Willamette daisy (*Erigeron decumbens*), and Bradshaw's lomatium (*Lomatium bradrawii*) (Connelly & Kauffman 1991; Jackson 1996; Pendergrass 1994; Kaye 1996). Monitoring of the rare plants is conducted annually and the data is analyzed to determine the effects of fire.

B. Conformance with the Land Use Plan (LUP) and Consistency with Related Subordinate Implementation Plans

LUP Name* Eugene District Record of Decision and Resource Management Plan
June 1995 Date Approved
*List applicable LUPs (e.g., Resource Management Plans or applicable amendments).
**List applicable activity, project, management, water quality restoration, or program pl

The proposed action is in conformance with the applicable LUPs because it is specifically provided for in the following LUP decisions:

The Eugene District RMP calls for implementing prescribed fire where needed and where possible to maintain or enhance special status plants, species habitat (pg. 55). The RMP (pg. 57) directs BLM to implement management actions/directions of the proposed RMP that are designed to enhance and maintain habitat for all endangered species in all Land Use Allocations. At page 72, the RMP states noxious weed and other non native pest plants will be controlled to maintain or restore Special Area values; at page 74, the RMP indicates emphasis would first be placed on using non chemical and other natural processes, including fire and manual removal methods, to control exotic or competing vegetation.

C. Identify the applicable NEPA document(s) and other related documents that cover the proposed action.

List by name and date all applicable NEPA documents that cover the proposed action.

- EA -96-21 West Greenhill Wetland Prairie Restoration
- EA-97-37 North Greenhill Wetland Prairie restoration

List by name and date other documentation relevant to the proposed action (e.g., source drinking water assessments, biological assessment, biological opinion, watershed assessment, allotment evaluation, rangeland health standard's assessment and determinations, and monitoring the report).

- Biological Assessment (2004) – Treatments to Enhance Rare Plant Populations at West Greenhill & Long Tom Area of Critical Environmental Concern (ACEC) in the West Eugene Wetlands.
- Biological Assessment - Management Activities to Protect and Enhance Three Listed Species at Balboa, Oxbow West, Fir Butte, and Coble sites in the West Eugene Wetlands.

D. NEPA Adequacy Criteria

1. Is the current proposed action substantially the same action (or is a part of that action) as previously analyzed?

Yes - The Proposed Action of prescribed fire on the West Greenhill unit is the same action previously analyzed in an Environment Analysis (EA-96-21/EA -97-37). These EAs analyzed the effects of prescribed fires for the same project area. Resources within the proposed burn are very similar to those in the areas covered by the existing EAs.

2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the current proposed action, given current environmental concerns, interests, resource values, and circumstances?

Yes – the Environment Assessment analyzed an appropriate range of alternatives given the purpose and need for the project. Three alternative were analyzed, the Proposed Action Alternative A (prescribed fire), Alternative B (no prescribed fire but all other actions would be implemented) and Alternative C (no action).

3. Is the existing analysis adequate and are the conclusions adequate in light of any new information or circumstances.

Yes – Studies indicate that prescribed fire has enhanced the reproductive status of Lomatium bradshawii (Pendergrass 1994; Kay 1996). Research conducted by the U.S Army Corps of Engineers' Fisher Butte site showed that Willamette daisy (Erigeron decumbens) increased its flower production and crown growth post burn year (1991). On going research at Oxbow West (Tom Kaye 1999) is examining the effects of prescribed fire, mowing, and weeding to the reproductive status of Willamette Daisy (Erigeron decumbens). Monitoring of the rare plants is conducted annually at W. Greenhill site. These findings are consistent with the effects analysis of the previous environmental analyses.

4. Do the methodology and analytical approach used in the existing NEPA document(s) continue to be appropriate for the current proposed action?

Yes – Ongoing research and annual monitoring at the W. Greenhill unit support continue use of prescribed fire as an appropriate method for enhancement & restoration of wetland prairie ecosystems.

5. Are the direct and indirect impacts of the current proposed action substantially unchanged from those identified in the existing NEPA document(s)? Does the existing NEPA document sufficiently analyze site-specific impacts related to the current proposed action?

Yes – Impacts from the continued use of prescribed fire to enhance & restore the native wetland prairie would remain the same. The prescribed burning would occur within the same location as the previous analyzed in the EA-96-21/EA-97-37 for the same purpose.

6. Can you conclude without additional analysis or information that the cumulative impacts that would result from implementation of the current proposed action are substantially unchanged from those analyzed in the existing NEPA document(s)?

Yes – soil disturbance treatments of the Proposed Action are not proposed for implementation in the fall 2004. No cumulative impacts beyond those already described in the RMP and in EAs (EA-96-21/EA-97-37) are anticipated from the implementation of prescribed fire on the 20 acres at W. Greenhill.

7. Are the public involvement and interagency review associated with existing NEPA document(s) adequately for the current proposed action?

Yes, Availability of the EA and the project decision was advertised in the Eugene Register Guard, sent to interested persons on our EA mailing lists and coordinated with The Nature Conservancy, Ed Alverson and consulted with the USFW Service in 2004.

E. Interdisciplinary Analysis: Identify those team members conducting or participating in the preparation of this worksheet.

Name	Title
Sally Villegas	Wildlife Biologist
Dharmika Henshel	Botanist
Nancy Ashlock	Fire Management Officer
Rick Colvin	Landscape Planner

CONCLUSION

☒ Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the existing NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of NEPA.
Note: If one or more of the criteria are not met, a conclusion of conformance and/or NEPA adequacy cannot be made and this box cannot be checked

/s/ Steven Calish
Signature of the Responsible Official

7/29/2004
Date

Finding of No Significant Impact/Decision Record

I have reviewed this Documentation of Land Use Plan Conformance and NEPA Adequacy (DNA) (OR090-DNA- 04-04) and have determined that the proposed action is in conformance with the approved land use plan (Eugene Record of Decision and Resource Management Plan, June 1995, as amended) and that no further environmental analysis is required.

On the basis of the information contained in the DNA Worksheet and the existing NEPA documents it references, and all other information available to me, it is my determination that implementation of the proposed action will not have significant environmental impacts beyond those already addressed in the environmental analysis (EA-97-37 & EA-96-21).

The BLM has made the determination that continued use of prescribed fire is required to help control shrubs and trees as well as enhance the reproductive status of Bradshaw's lomatium and the Willamette daisy. Therefore, it is my decision to implement the project, as described, in the DNA Worksheet.

Authorized Official: /s/ Steven Calish
Steve Calish, Field Manager, Siuslaw Resource Area

Date: 7/292004